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May 18, 2016

Freedom of Information Officer  
U.S. Environmental Protection Agency  
Region 3

*Via online form submission*

Re: Freedom of Information Act request for Records Pertaining to Erachem Comilog, Inc. in Baltimore, Maryland (RCRA ID MDD038862769)

Dear Freedom of Information Officer:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 551 et seq., I am writing on behalf of the Environmental Integrity Project (EIP) to request records held by the Environmental Protection Agency (EPA) concerning the Erachem Comilog, Inc. facility located at 610 Pittman Road, Baltimore, MD 21226 (RCRA ID MDD038862769) (hereinafter "Facility"). Specifically, EIP seeks records concerning:

- Groundwater monitoring data analytical results, and other related information, including documents that identify the location of groundwater monitoring wells, and soil sampling results from January 1, 2005 to present;
- Records of all manifests for transport of waste from the Facility to off-site locations from January 1, 2011 to the present;
- All hazardous and solid waste inspection reports from January 1, 2000 to present, including but not limited to groundwater monitoring inspections;
- Notices of Violations, consent orders, judicial complaints, related correspondence, and any other enforcement-related documents regarding the Facility's management of hazardous and solid waste from January 1, 1990 to the present;
- All TSD permit applications filed with MDE from January 1, 1990 to the present, including but not limited to Part A and Part B under Subtitle C of RCRA, in EPA's possession;
- Records of all RCRA permits, including the base and HSWA portions of the permit, issued and/or effective from January 1, 1995 to the present;
- Records identifying the location of on-site hazardous waste storage and/or disposal units from January 1, 1990 to present;
- Records from January 1, 2000 to the present related to the Facility's hazardous or solid waste off-site treatment, recycling or disposal, including records related to transport of wastes to Republic Services, located in Niagara NY;

- Records from January 1, 1990 to the present specifically related to Erachem's surface impoundment, including any records related to aquifer assessment;
- Maps, aerial photographs or imagery, or other diagrams identifying, or that could potentially identify, the location and type of storage, treatment, or disposal unit on-site, including waste piles, scrap piles, drum storage areas, ponds, lagoons, impoundments, or land disposal units from January 1, 1995 to present;
- Records, including workplans, related to any corrective action undertaken at the site from January 1, 1995 to the present;
- Records related to any and all hazardous waste determinations, including the results of toxicity characterization of the wastes generated on site from January 1, 1995 to the present;
- Records related to the generation, treatment, storage, transport, and disposal of characteristic wastes or listed hazardous wastes generated on-site, including those with waste codes F003, P069, U122, U123, and U154 from January 1, 1995 to the present; and
- Correspondence, including emails, between MDE and EPA regarding the status, including compliance status, of the Facility as a large quantity generator or a potential TSD facility, from January 1, 1995 to the present.

Please include in your response an explanation of which records, if any, may be privileged or exempt from this FOIA request and why. If you claim that the records should not be disclosed, please justify your refusal by referring to the specific exemption that you are invoking under FOIA. In addition, please provide those portions of documents with information requested that are not specifically exempted from disclosure.

Moreover, I have included a request for a fee waiver as an attachment. If you determine not to grant a fee waiver and the costs of completing this FOIA request will exceed \$500.00, please contact me at your earliest convenient with the estimated costs of completion.

Thank you for your assistance with this FOIA request; I look forward to hearing from you. If I can provide any additional information or answer any questions, please do not hesitate to contact me at (202) 888-2701 or slam@environmentalintegrity.org.

Sincerely,



Sylvia Lam  
Law Fellow  
Environmental Integrity Project  
1000 Vermont Avenue NW, Suite 1100  
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Attachment